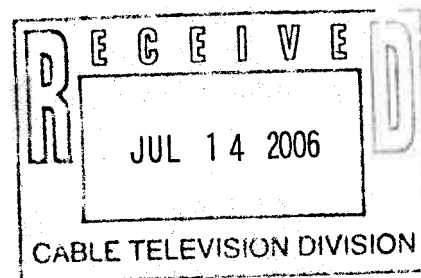




MASSACHUSETTS MUNICIPAL ASSOCIATION

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July 13, 2006

Andrea Nixon
Clerk, Cable Television Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02111

VIA HAND DELIVERY

RE: Docket No. CTV 06-1, Comments on Proposed Amendments to Rules and
Regulations Governing the Cable Television Licensing Process

Dear Ms. Nixon,

On behalf of the cities and towns of the Commonwealth, the Massachusetts Municipal Association (MMA) wishes to comment on Docket No. CTV 06-1, Proposed Amendments to Rules and Regulations Governing the Cable Television Licensing Process. Further, the MMA commends and endorses in their entirety the comments submitted by the firm of Epstein and August on behalf of numerous municipalities and the Northeast Region and Massachusetts Chapter of the Alliance for Community Media, and we refer to that submission in all areas of detail and specificity.

The Massachusetts Municipal Association strongly opposes the March 16, 2006, rulemaking petition filed by Verizon with the Cable Division of the Department of Telecommunications and Energy. The MMA represents the public interest of the cities and towns of Massachusetts, and thus is very concerned that Verizon's petition proposes extremely unreasonable new rules for initial cable licensing.

The proposed rules would require a municipality to hold a public hearing on an initial cable television license application within 60 days of the application filing, and would allow only 30 days from the time of the public hearing for the municipality to approve or disapprove the application, and issue the actual license in case of approval.

Local officials with extensive experience in this area confirm that it is impossible to conclude a proper initial license application review, negotiation, license drafting and issuance within 30 days of the public hearing. Such an initial licensing time frame would be untenable in the best of circumstances, and is particularly untenable now in light of the many questions of first impression and complex issues raised by the non-standard terms and conditions commonly reported to be included in Verizon-proposed cable license.

As the Department knows from RCN's initial licensing experience, cable operators willing to negotiate customary and standard cable licenses enjoy reasonable and fast municipal licensing. The existing license timetables have worked well for decades. They should not be changed at the behest of a single proponent. Note that Congress contemplated and provided for a three-year renewal process when it more comprehensively and carefully set forth cable licensing rules in the 1984 Cable Act. This framework worked well for decades and there is no rational basis for casting aside the time tested licensing rules and replacing them with radically abbreviated rules.

The municipal officials who are responsible for implementing licensing and who are accountable to the public are in opposition to the proposed rules and regulations contained in the Verizon petition. Municipal officials are concerned that under the proposed rules they will be boxed into an untenable 30 day post-hearing licensing process, and municipalities will lose the ability to properly review and negotiate Verizon cable proposals. This is not even close to what is reasonably needed for a fair and reasonable licensing process.

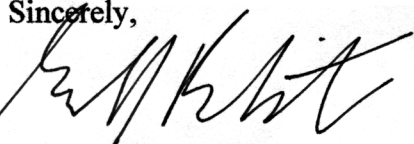
Cities and towns have a duty to represent the important public interests of their community and their residents during the negotiation process. They must ensure proper care, control and accountability regarding use of the public rights-of-way, adequate PEG access and programming, fair and non-discriminatory network build-out to provide appropriate access for the entire community and all consumers, ensuring adequate provisions for service to schools and municipal buildings, and many other important matters.

In addition, the United State Congress is currently reviewing the video franchise process for the nation and may be close to amending the current franchising provisions in federal law, or creating a national franchise process. Therefore, we believe it is wise for the Commonwealth to await Congress's final position on this matter before considering the imposition of any new burdens on cities and towns, or before promulgating changes in the current Massachusetts regulatory framework.

For the above-stated reasons, the Massachusetts Municipal Association and local officials across the Commonwealth urge the Massachusetts Cable Division to reject the Verizon petition.

Thank you for your attention to this matter. If you have any further questions, please do not hesitate to contact us at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoffrey C. Beckwith", written over a horizontal line.

Geoffrey C. Beckwith
Executive Director